

Mrs Elizabeth Reynolds  
BOWL Consents Advisor  
SSE Renewables Limited  
1 Waterloo Street  
Glasgow  
G2 6AY

Our Ref: 003/OW/BOWL - 8

26<sup>th</sup> April 2018

Dear Mrs Reynolds,

## **MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING**

### **Condition 3.1.7 – Chemical Usage**

Thank you for your correspondence dated 10<sup>th</sup> April 2018 providing the updated list of chemicals from Beatrice Offshore Windfarm Limited (“BOWL”) on behalf of their contractor Seaway Heavy Lifting (“SHL”), in line with condition 3.1.7 – *Chemical Usage* of the Wind farm Marine Licence (licence number: 04462/18/0).

In your correspondence you stated that the list has been updated to include the following: Slipkote (Friction reducing lubricant); Jet Lube Jacking Grease ECF, indentified as possible replacement for Slipkote; and a group of maintenance chemicals. You have also stated that Slipkote has “...*already been deployed during interarray cable installation works*” and consequently you have requested that Marine Scotland Licensing Operations Team (“MS-LOT”) give retrospective approval for this chemical.

Concerning maintenance chemicals. These are not covered by the Offshore Chemicals Regulations 2002 (as amended 2011) because they are identified to be low risk due to their purposes (for example anti-corrosion paints). Please note that these chemicals are different from chemicals that are used for maintenance operations, the use of which is not addressed in this letter. Under normal circumstances maintenance chemicals do not need to be submitted to the Scottish Ministers for approval, however, MS-LOT do require formal notification of these chemicals for recording purposes.

The chemical Slipkote is not ranked in the Offshore Chemicals Notification Scheme (“OCNS”) list, therefore MS-LOT requested the following information:

- Maximum depth at which the chemical has been deployed
- Current speed at the site where the chemical has been deployed

BOWL provided this information on the 17<sup>th</sup> April 2018 and MS-LOT undertook research and modelling of the chemical and obtained advice from an Offshore Chemical Risk Assessor from the Offshore Enrgy Environmental Advice Group department of Marine Scotland Science, and concluded that the risk to the marine environment for the discharge of the amount used so far of Slipkote would be deemed acceptable.

The chemical Jet Lube Jacking Grease ECF is ranked on the OCNS list as a non-charmable product, group E with no substitution warning, and therefore the chemical is deemed to have the least environmental hazard.

MS-LOT, on behalf of the Scottish Ministers, is content to grant retrospective approval of the use of Slipkote and approval for future use (if required) of the Jet Lube Jacking grease ECF. However, as this is a minor non-compliance, if in the future a similar case were to occur, MS-LOT will undertake non-compliance actions.

Yours sincerely,

Jessica Drew  
Marine Scotland Licensing Operations Team